

August 7, 1973

Re: Ohio Rubber Company, Willoughby, Ohio  
Premise # 02-43-16-0174

Office of Regulations  
Ohio EPA  
Seneca Towers  
361 East Broad Street  
Columbus, Ohio



Attn: Mr. Robert Carey

John J. Gilligan  
Governor  
Dr. Ira L. Whitman  
Director

Dear Robert:

This letter is to advise your office as to the status of Ohio Rubber Company's air permit status. To date the only permit application we have received are for their boilers (See correspondence). The coal-fired boiler requires a variance for particulate and SO<sub>x</sub>.

We have had two meetings with representatives from Ohio Rubber and have been very specific as to the requirements for receiving a variance. The Vice President, Mr. E. Spencer has discussed increasing the efficiency of his multiclone collectors for his coal-fired boiler but SO<sub>x</sub> control is the real economic hurdle, so he continues to revert back to boiler conversion, natural gas or fuel oil.

Ohio Rubber is on the State's "Major Pollutor List" and has numerous smoke and odor complaints on file. I have been informed that the Governor, Adelle Mitchell, and the Willoughby City Council have all received complaints, regarding smoke and odors.

Needless to say this office has recommended denial of Ohio Rubber's coal-fired boiler variance to the office of Authorization and Compliance but we have not received anything (not even permit application) covering his processes, specifically the rubber digesters which are the major source of the odors.

Mr. Spencer has made reference to a consulting firm working on the odor problem, but has not provided anything concrete for this office to take hope in.

To date, this is, in a nut-shell, what has transpired between Ohio EPA and Ohio Rubber. This office has taken official action as far as we are allowed.

US EPA RECORDS CENTER REGION 5

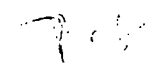


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Ohio Rubber Company  
August 7, 1973  
Page # 2

If and when Authorization and Compliance gets the denial moving,  
I hope you will make sure the process permits are also specified  
as required, by the specified date or legal action.

Yours truly,

  
James Riddell,  
Environmental Engineer  
N.E.D.O.

JMR/ng

Enclosure